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Moonbug Entertainment Limited and
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOONBUG ENTERTAINMENT
LIMITED and TREASURE STUDIO, INC.,

Plaintiffs,

v.

BABYBUS CO., LTD and BABYBUS
(FUJIAN) NETWORK TECHNOLOGY
CO., LTD,





Defendants.

Case No: 3:21-cv-06536-EMC

**EXHIBIT J TO THE DECLARATION
OF FRAN KRAUSE IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT OF
NONINFRINGEMENT**

FILED UNDER SEAL

EXHIBIT J – Substantial Similarity in Super JoJo’s “Doctor Checkup Song”

Images/Text in Super JoJo Planning Documents ¹	Original Images in CoComelon “Doctor Checkup Song” (MB037930) ²	Substantially Similar Material in Super JoJo “Doctor Checkup Song” (BB_00012963) ³
<p>Outline: The baby plays as the doctor to help the older brother and older sister to do the health check. The children will learn about the health check through fun games.</p> <p>Text from BB_00000755 and BB_00001023.</p> <p>The baby dressed as a doctor stops at the small table with the health examination kit. Bingo follows him carefully like a little assistant.</p> <p>Text from BB_00001027.</p>	 <p>Image from MB37930 at 0:16 – JJ sets up a make-believe doctor’s office in the family’s playroom.</p>	 <p>Image from BB_00012963 at 0:07 – JoJo sets up a make-believe doctor’s office in the family’s playroom.</p>
<p>Elder brother and sister happily open the door to come in. The baby has been sitting in front of the small table while carefully looking at the hand and looking at elder brother and sister. Brother and sister look at each other, waiting with expectation but nervously for the health examination.</p> <p>Text from BB_00001027.</p>	 <p>Image from MB37930 at 0:19 – JJ’s sister and brother open the door and enter.</p>	 <p>Image from BB_00012963 at 0:13 – JoJo’s sister and brother open the door and enter.</p>

¹ I am informed that BB_00000755 and its certified translation are provided as Exhibit F to the Hedley Declaration, and BB_00001023 and its certified translation are provided as Exhibit G to that declaration, both filed commensurately.

² CoComelon Works cited in this document: Dkt. No. 165 (all of the following are exhibits to Apple Declaration manually filed at Dkt. No. 165), Ex. 060 - MB037930 (Doctor Checkup Song).

³ Super JoJo Infringing Works cited in this document: Dkt. No. 165, Ex. 152 - BB_00012963 (Doctor Checkup Song), *see also* Dkt. 180-3, Ex. T-3.

Images/Text in Super JoJo
Planning Documents¹



Image from BB_00000756 and BB_0001024.

Artistic requirements: 1. Height measuring instrument ... At least 1.5 times the height of the elderbrother (cannot be lower than the height). For the shape, see the reference figure below:



... ※ The long red device on the left will be automatically lowered to the top of the head of the Figure ...

Image from BB_00001023.

© The elder brother steps on the height measuring instrument and stands straight to measure his height. The instrument moves up and down on the elder brother's head which amazes the baby and Bingo.

...

© The baby writes down the data on the table, finding his elder siblings staring at him, so he gives them a thumbs up (or a clap).

Text from BB_00001027.

Original Images in CoComelon
"Doctor Checkup Song" (MB037930)²



Image from MB37930 at 0:29 - closeup of feet on scale.



Image from MB37930 at 0:30.



Image from MB037930 at 0:31 – JJ uses a device that automatically moves to measure the height of his sister.

Substantially Similar Material in Super JoJo
"Doctor Checkup Song" (BB_00012963)³









Image from BB_00012963 at 0:41 - closeup of feet on scale.



Image from BB_00012963 at 0:17.



Image from BB_00012963 at 0:31 – JoJo uses a device that automatically moves to measure the height of his sister.

Images/Text in Super JoJo Planning Documents ¹	Original Images in CoComelon "Doctor Checkup Song" (MB037930) ²	Substantially Similar Material in Super JoJo "Doctor Checkup Song" (BB_00012963) ³
<p>© The baby points to the scale, and the brother steps on and keeps still. The pointer waggles to six o'clock. Baby looks at the scale and smiles with satisfaction.</p> <p>Text from BB_00001027.</p>	 <p>When you go see the doctor for your checkup today</p> <p>Image from MB037930 at 0:37 – JJ directs his brother to use the scale.</p>	 <p>Image from BB_00012963 at 0:40 – JoJo directs his brother to use the scale.</p>
<p>The baby walks to the test table with his hands behind his back. He takes out the indicator stick and points on the test table.</p> <p>Text from BB_00001027.</p>	 <p>He'll check how well you see and hear</p> <p>Image from MB037930 at 1:11 – JJ uses a pointer and an eye chart.</p>	 <p>Image from BB_00012963 at 1:01 – JoJo uses a pointer and an eye chart.</p>
<p>© The brother covers one of his eyes and points to the right direction as the baby indicates on the chart. The brother covers his another eye and gets all the answers right. The baby claps for the brother.</p> <p>Text from BB_00001028.</p>	 <p>He'll check how well you see and hear</p> <p>Image from MB037930 at 1:12 – JJ's brother uses an eye-cover to test his vision.</p>	 <p>Image from BB_00012963 at 1:05 – JoJo's brother uses an eye-cover to test his vision.</p>

**Images/Text in Super JoJo
Planning Documents¹**



Image from BB_00000756 and BB_00001025.

© The physical examination results of elder brother and sister are: Height ✓, weight ✓, eyesight ✓, oral teeth ✓, lung capacity ✓.

Text from BB_00001024.

※For the ending, please refer to the 2:22-2:30 in Cocomelon:

<https://www.youtube.com/watch?v=sM4IF7ZaKxo>

Text from BB_00001029.

**Original Images in CoComelon
"Doctor Checkup Song" (MB037930)²**



Image from MB037930 at 2:22 - JJ displays his results.



Image from MB037930 at 2:29 - kids laugh as camera pulls away.

**Substantially Similar Material in Super JoJo
"Doctor Checkup Song" (BB_00012963)³**



Image from BB_00012963 at 2:28 - JoJo displays his results.



Image from BB_00012963 at 2:34 – kids laugh as camera pulls away.